

FOX ROTHSCHILD LLP

Karen A. Confoy
Paul W. Kalish
Princeton Pike Corporate Center
997 Lenox Drive
Lawrenceville, NJ 08648
Phone: (609) 844-3033
Fax: (609) 896-1469
kconfoy@foxrothschild.com
pkalish@foxrothschild.com

OF COUNSEL:

OPPENHEIM + ZEBRAK LLP

Matthew J. Oppenheim (*pro hac vice* forthcoming)
Scott A. Zebrak (*pro hac vice* forthcoming)
Nicholas C. Hailey (*pro hac vice* forthcoming)
Ever M. Hess
4530 Wisconsin Avenue, NW, 5th Floor
Washington, DC 20016
(202) 480-2174
Attorneys for Plaintiff Pearson Education, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PEARSON EDUCATION, INC.,

Plaintiff,

v.

CHEGG, INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)

Case No. 2:21-cv-16866-SDW-ESK

**CERTIFICATION OF KAREN A.
CONFOY, ESQ. IN SUPPORT OF
PLAINTIFF'S *PRO HAC VICE*
APPLICATION**

I, Karen A. Confoy, Esq., hereby certify that:

1. I am an attorney at law licensed to practice before the courts of the State of New Jersey and this United States District Court. I am a partner with the law firm of Fox Rothschild LLP, attorneys for Plaintiff Pearson Education, Inc., (“Pearson” or “Plaintiff”) in the above-

captioned matter. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. This Certification is offered in support of Plaintiff's Motion for entry of an Order permitting Matthew J. Oppenheim, Esq., Scott A. Zebrak, Esq., and Nicholas C. Hailey, Esq. leave to appear and participate *pro hac vice* in the above-captioned matter on Plaintiff's behalf.

3. Mr. Oppenheim's qualifications and good standing as a member of, *inter alia*, the Maryland State Bar, are set forth in his written Declaration, offered in support of the instant Motion.

4. Mr. Zebrak's qualifications and good standing as a member of, *inter alia*, the Virginia State Bar, are set forth in his written Declaration, offered in support of the instant Motion.

5. Mr. Hailey's qualifications and good standing as a member of, *inter alia*, the Virginia State Bar, are set forth in his written Declaration, offered in support of the instant Motion.

6. Defendant Chegg, Inc., through counsel, has consented to the *pro hac vice* admission of Mr. Oppenheim, Mr. Zebrak, and Mr. Hailey.

7. Pursuant to L. CIV. R. 101.1(c)(4), all pleadings, briefs, and other papers filed with the Court will be signed by a partner or associate of the law firm Fox Rothschild LLP, attorneys of record for Plaintiff, who shall be held responsible for said papers and the conduct of the cause and who shall be present in Court during all stages of this proceeding, unless expressly excused by the Court, as well as to be held responsible for the conduct of the admitted attorneys herein.

8. I will ensure that Mr. Oppenheim, Mr. Zebrak, and Mr. Hailey comply with L. CIV. R. 101.1(c)(3) and inform them of their obligation to make annual payments to the New Jersey Lawyers Fund for Client Protection pursuant to L. CIV. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2(a).

9. For the foregoing reasons, I respectfully request that this Court grant Plaintiff's Motion for the *pro hac vice* admission of Matthew J. Oppenheim, Esq., Scott A. Zebrak, Esq., and Nicholas C. Hailey, Esq.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 1, 2021

/s Karen A. Confoy
Karen A. Confoy
kconfoy@foxrothschild.com